

## **REMARKS**

Applicants respectfully traverse and request reconsideration.

Applicants wish to thank the Examiner for the notice that claims 98 and 99 are allowed.

Claims 1-6, 8-13, 34-35, 55-61 and 63-68 stand rejected under 35 U.S.C. § 112, first paragraph as allegedly failing to comply with the written description requirement. Applicants have corrected typographical errors.

Claims 1-5, 8-10, 13, 34-35, 55, 89, 91 and 94 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Jouppi et al. The Jouppi reference is directed to a different operation and structure from that claimed. Jouppi is directed to a system that instead of using full scene super sampling, uses a hybrid form of sparse super sampling referred to as indexed sparse super sampling (see col. 6, lns. 53-62). Each fragment described in Jouppi is not a subsample. In fact, as shown in FIG. 3 since Jouppi utilizes sparse super sampling, subsamples S1-S4 – namely four subsamples – are used for a pixel broken up into 16 fragments. Jouppi instead of using subsamples per fragment uses pointers to point to the fragment triples. Also, Jouppi deals with per-pixel fragment triple based compression and not tile based compression suitability evaluation nor partial compression of tiles as claimed.

Amended claim 1 and other independent claims require determining that a tile is suitable for partial compression when the tile is covered by a plurality of primitives and evaluating, prior to compression, determining the compression suitability of tiles to determine if the tile is to be fully compressed, partially compressed or uncompressed. This is not taught or suggested in Jouppi. The office action alleges that the Jouppi reference taught in col. 6, lns. 15-20 evaluating the tiles for compression suitability. However, the cited portion instead refers to increasing or decreasing the amount of memory for storing fragment triples so that more than a fixed number

of fragment triples can be used to represent a pixel. Jouppi appears to be silent as to determining whether a tile is suitable for full compression, partial compression or no compression and designating a tile for partial compression when the tile is covered by a plurality of primitives. No compression suitability determination is discussed. Since the reference does not teach what is alleged, Applicants respectfully submit that the claims are in condition for allowance.

As to claims 8 and 91, the cited portion of Jouppi, namely col. 3, lns. 60-67 and col. 4, lns. 1-10 make no mention whatsoever of any determination as to whether a tile is covered by less than two triangle primitives. In fact, there is no mention of any determination as to whether a tile is covered by no more than two triangle primitives to determine that a tile is suitable for partial compression. The cited portion instead simply indicates that the fragments as described in Jouppi are created by clipping a primitive of an image. Although it indicates that fragments can be from different objects or surfaces of the image, there is absolutely no discussion of any tile based compression evaluation utilizing a number of primitives covering a tile to determine whether to use partial compression or other level of compression as claimed. Since the reference does not teach what is alleged, Applicants respectfully submit that the claims are in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter.

Claims 6, 12, 55-61, 63-65, 67-68, 90 and 92 stand rejected under 35 U.S.C. §103(a) as allegedly being referenced obvious by Jouppi et al. in view of Molnar. Applicants respectfully reassert the relevant remarks above with respect to Jouppi and accordingly these claims are also allowable for at least this reason.

Accordingly, Applicants respectfully submit that the claims are now in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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